

**REMARKS**

Claims 1-20 are currently pending in the application. Claims 1, 12-13, and 19 have been amended. No claims have been canceled. Applicant respectfully submits that no new matter has been added. Applicant respectfully requests reconsideration of the application in view of the foregoing amendments and the following remarks.

Claims 1-11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,832,447 to Rieker et al. ("Rieker"), in view of U.S. Patent No. 6,067,522 to Warady et al. ("Warady"), in view of U.S. Patent No. 6,601,020 to Myers ("Myers"), and further in view of U.S. Patent Application Publication No. 2002/0026332 to Snowden et al. ("Snowden").

Independent claim 1 relates to a computer system for use in a web-based managed care transaction system. Applicant respectfully submits that the cited combination of Rieker, Warady, Myers, and Snowden fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 1, namely, a set of linked data tables organized into a logical entity and a set of one or more member history tables associated with a member table, each member history table associated with a given employer plan, wherein the logical entity is persistent over changes to each members' changes within an employer plan. In addition, the cited references fail to disclose wherein a web-based managed care transaction system is adapted to enable, via the linked set of data tables, an administrative account to be moved across health plans of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the administrative account via a web browser, the administrative account comprising a history of health plans including past and present health plans of the at least one member.

The Examiner acknowledges that the combination of Rieker, Warady, and Myer fails to disclose a web-based managed care transaction system adapted to provide, via the linked set of data tables, a history of healthcare benefits of the at least one member throughout their life and allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member. The Office Action asserts that Snowden teaches these features on Page 3,

Paragraphs 0078-0080 and Figure 2. Applicant respectfully disagrees, and points out that currently amended claims are not disclosed by Snowden. Snowden discloses a secure repository for personal medical records for individuals and families. The medical records are accessible via secure connections for transmission to health care providers, insurers, or suppliers. Snowden discloses a system capable of storing lifelong electronic patient health records but fails to disclose a system that is adapted to provide, via the linked set of data tables, a history of an *administrative account to be moved across health plans* of the at least one member throughout their life as claimed.

Additionally, in contrast to claim 1, Snowden fails to disclose a web-based managed care transaction system adapted to allow the at least one member to review and manage the administrative account via a web browser, the administrative account comprising a history of health plans including past and present health plans of the at least one member. Applicant respectfully submits that there is a "categorical difference" between electronic patient health records as taught by Snowden and the history of health plans as claimed. The electronic patient health records appear to relate to a patient's complete medical records and the treatments received by the patient which is different from a history of health plans including past and present health plans as claimed.

Applicant respectfully submits that independent claim 1 distinguishes over the cited combination of Rieker, Warady, Myers, and Snowden. Withdrawal of the rejection of independent claim 1 is respectfully requested.

Dependent claims 2-11 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-11 distinguish over Rieker, Warady, and Myers and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-11 is respectfully requested.

Claims 12-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Myers, Rieker, Warady, in view of U.S. Patent No. 6,263,330 to Bessette (“Bessette”), and further in view of Snowden.

Independent claim 12 relates to a web-based managed care transaction system accessible over a computer network using a client browser. Applicant respectfully submits that the cited combination of Rieker, Warady, Myers, and Snowden fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 12, namely, a database for storing a set of linked data tables organized into a persistent logical entity wherein the logical entity maintains data on each member in spite of status changes. In addition, the cited combination of Rieker, Warady, Myers, and Snowden fails to disclose wherein the web-based managed care transaction system is adapted to enable, via the linked set of data tables, an administrative account to be moved across health plans of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the administrative account via the client browser, the administrative account comprising a history of health plans including past and present health plans of the at least one member. Bessette fails to cure the deficiencies of Rieker, Warady, Myers, and Snowden noted above. Furthermore, Applicant submits that claim 12 patentably distinguishes over the cited references for similar reasons to those discussed above with respect to independent claim 1. Withdrawal of the rejection of independent claim 12 is respectfully requested.

Independent claim 13 relates to a network-based managed care system. Applicant respectfully submits that the cited combination of Rieker, Warady, Myers, and Snowden fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 13, namely, wherein the network-based managed care system is adapted to enable, via the database, an administrative account to be moved across health plans of the at least one member throughout their life and wherein the administrative account comprises a history of health plans including past and present health plans of the at least one member. Bessette fails to cure the deficiencies of Rieker, Warady, Myers, and Snowden noted above. Furthermore, Applicant submits that claim 13 patentably distinguishes over the cited references for similar

reasons to those discussed above with respect to independent claims 1 and 12. Withdrawal of the rejection of independent claim 13 is respectfully requested.

Dependent claims 14-20 depend from and further restrict independent claim 13 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 13, dependent claims 14-20 distinguish over the cited references and are in condition for allowance. Withdrawal of the rejection of dependent claims 14-20 is respectfully requested.

In view of the above amendment, Applicant respectfully submits that the present application is in condition for allowance. A Notice to that effect is respectfully requested.

Dated: January 9, 2008

Respectfully submitted,

By 

Shoaib A. Mithani

Registration No.: 61,654

WINSTEAD PC

P.O. Box 50784

Dallas, Texas 75201

(214) 745-5400

Attorneys For Applicant